From: <u>Jennifer Koockogey-Lajoie</u>

To:Robert KuczynskiCc:Susan Ackerman

Subject: RE: Codrington/Alexander-- Reply to Opposition re: Motion to Dismiss

Date: Thursday, May 19, 2022 8:25:23 AM

EXTERNAL EMAIL

Good Morning:

I would like my position noted in your request as follows:

Plaintiff's position is that there is enough evidence in the record to deny the motion and the expense of an evidentiary hearing is unnecessary.

Jennifer S. Koockogey-Lajoie, Esq.

Lee J. Rohn and Associates 1108 King Street Third Floor Christiansted, VI 00820 (340) 778-8855-phone

(340)-773-2954-fax

"Let us rise up and be thankful, for if we didn't learn a lot today, at least we learned a little, and if we didn't learn a little, at least we didn't get sick, and if we got sick, at least we didn't die; so, let us all be thankful."-Gautama Buddha

From: Robert Kuczynski < Robb@beckstedtlaw.com>

Sent: May 18, 2022 4:33 PM

To: Jennifer Koockogey-Lajoie <jennifer@rohnlaw.com>

Cc: Susan Ackerman <susan@rohnlaw.com>

Subject: RE: Codrington/Alexander-- Reply to Opposition re: Motion to Dismiss

Hi Jennifer,

We are going to file a motion to request an evidentiary hearing on our pending motions to dismiss for lack of personal jurisdiction in *Codrington* and *Alexander*. Pursuant to the local rules, I'm writing to see if you oppose the request. Again, we are filing a motion to request that the Court hold an evidentiary hearing over our pending motions to dismiss once they have been fully briefed. Please let me know your positions.

Thanks,

Robb

From: Jennifer Koockogey-Lajoie < <u>jennifer@rohnlaw.com</u>>



Sent: Thursday, May 5, 2022 11:12 AM

To: Robert Kuczynski <<u>Robb@beckstedtlaw.com</u>> **Cc:** Susan Ackerman <<u>susan@rohnlaw.com</u>>

Subject: RE: Codrington/Alexander-- Reply to Opposition re: Motion to Dismiss

EXTERNAL EMAIL

Yes no problem.

From: Robert Kuczynski < <u>Robb@beckstedtlaw.com</u>>

Sent: May 5, 2022 11:09 AM

To: Jennifer Koockogey-Lajoie < <u>iennifer@rohnlaw.com</u>>

Cc: Susan Ackerman <<u>susan@rohnlaw.com</u>>

Subject: Codrington/Alexander-- Reply to Opposition re: Motion to Dismiss

Importance: High

Good Morning Jennifer,

Can we get a 10 day extension until May 20 to file our reply to your oppositions in the *Codrington* and *Alexander* cases? Thank you for your anticipated courtesies.

Robb J. Kuczynski Beckstedt & Kuczynski LLP 2162 Church Street Christiansted, VI 00820-4604

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